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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley*
12 *ABS Capital I Inc. Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 DEUTSCHE BANK NATIONAL TRUST
16 COMPANY, AS TRUSTEE FOR MORGAN
17 STANLEY ABS CAPITAL I INC. TRUST
18 2007-NC1 MORTGAGE PASS-THROUGH
19 CERTIFICATES, SERIES 2007-NC1,

20 Plaintiff,

21 vs.

22 FIDELITY NATIONAL TITLE GROUP,
23 INC.; FIDELITY NATIONAL TITLE
24 INSURANCE COMPANY; FIDELITY
25 NATIONAL TITLE AGENCY OF NEVADA,
26 INC.; DOE INDIVIDUALS I through X; and
27 ROE CORPORATIONS XI through XX,
28 inclusive,

Defendants.

Case No.: 2:20-cv-02146-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
27-29]**

[First Request]

Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS
Capital I Inc. Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1
("Deutsche Bank Trustee"), Specially-Appearing Defendant Fidelity National Title Group, Inc.
("Fidelity"), and Defendants Fidelity National Title Insurance Company ("Fidelity National")
and Fidelity National Title Agency of Nevada, Inc. ("Fidelity Agency", collectively
"Defendants"), by and through their counsel of record, hereby stipulate and agree as follows:

1. On November 20, 2020, Deutsche Bank Trustee filed its Complaint in Eighth Judicial District Court, Case No. A-20-825215-C [ECF No. 1-1];
2. On November 22, 2020, Fidelity National filed its Petition for Removal to this Court [ECF No. 1];
3. On February 8, 2021, Fidelity National filed a Motion to Dismiss [ECF No. 27];
4. On February 8, 2021, Fidelity Agency also filed a Motion to Dismiss [ECF No. 28];
5. On February 8, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 29];
6. Deutsche Bank Trustee's deadline to respond to Defendants' Motions to Dismiss is currently February 22, 2021;
7. Deutsche Bank Trustee's counsel is requesting an extension until March 24, 2021, to file its response to the pending Motions to Dismiss;
8. This extension is requested to allow Deutsche Bank Trustee additional time to finalize and file its response to the pending Motions to Dismiss as lead handling counsel for Deutsche Bank Trustee continues to recover from an unexpected medical emergency.
9. Counsel for Defendants does not oppose the requested extension;

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